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10 Attorney for Defendant

11 ALEXANDER HLEUKA

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13
14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16
17 UNITED STATES OF AMERICA,

18) Case No. 2:24-cr-00190-AC
19 Plaintiff,)
20) STIPULATION AND [PROPOSED] ORDER
21 v.) TO CONTINUE STATUS CONFERENCE
22)
23 ALEXANDER HLEUKA,

24) Date: August 19, 2024
25 Defendant.) Time: 9:00 a.m.
26) Judge: Hon. Allison Claire
27)
28)

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18 **IT IS HEREBY STIPULATED**, by and between the parties, through their respective
19 counsel, Assistant United States Attorney Nicholas Fogg counsel for Plaintiff, and Assistant
20 Federal Defender Linda Harter, counsel for defendant Alexander Hleuka, that the status
21 conference scheduled for July 29, 2024, at 9:00 a.m. be continued to **August 19, 2024, at 9:00**
22 **a.m.**

23 This continuance is requested because defense counsel and her investigator needs more
24 time to conduct an investigation concerning mitigation in preparation for plea negotiations.
25 Defense counsel will need time to review a plea agreement with Mr. Hleuka. Counsel for
26 defendant believes that failure to grant the above-requested continuance would deny counsel the
27 reasonable time necessary for effective preparation, taking into account the exercise of due
28 diligence, as well as continuity of counsel.

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2 For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the
3 parties request that the time period between July 29, 2024 and August 5, 2024, inclusive, be
4 deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would
5 result from a continuance granted by the Court at the defense's request, based on a finding that
6 the ends of justice served by granting the continuance outweighs the best interest of the public
7 and Mr. Hleuka in a speedy trial.

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9 Dated: July 23, 2024

Respectfully submitted,

10 HEATHER E. WILLIAMS
11 Federal Public Defender

12 /s/ Linda Harter
13 LINDA HARTER
14 Assistant Federal Defender
15 Attorney for ALEXANDER HLEUKA

16 Dated: July 23, 2024

PHILLIP A. TALBERT
17 United States Attorney

18 /s/ Nicholas Fogg
19 NICHOLAS FOGG
20 Assistant US Attorney
21 Attorney for Plaintiff

[PROPOSED] ORDER

IT IS HEREBY ORDERED that “per Judge Claire the status conference is continued to **August 19, 2024 at 9:00 a.m.**”

Dated: July 29, 2024

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE